EPA Registration File No. 81964-4

PROCESSING REQUEST

Reg #: 8/964-4 Decision #: 497488
Description: Remove voluntory revidential use sic
restrictive longuage.
Material Available Electronically (see PPLS):
□ Electronic Label/Letter Dated: 2-6-15
Other:
Material Sent (see jacket):
☐ Stamped Label/Letter Dated:
☐ Notification Dated:
☐ New CSF(s) Dated:
Other:
File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and
materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and
bring it down to the (ISC). For further information please call 703-605-0716.
Reviewer: Banga Manaa
Division: RD FFB
Phone: 3057269 Date: 9-6-15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 6, 2015

Ms Ann Tillman agent for ChemStarr, LLC c/o Pyxis Regulatory Consulting, Inc 4110 135th St. NW Gig Harbor, WA 98332

Subject: Label Amendment – Remove voluntary residential use site restrictive language

Product Name: Tide Triadimefon Technical

EPA Registration Number: 81964-4 Application Dates: 10/24/14 & 12-29-14

Decision Number: 497488

Dear Ms. Tillman:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Page 2 of 2 EPA Reg. No. 81964-4 Decision No. 497488

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Banza Djapao at 703-305-7269 or by email at djapao.banza@epa.gov.

Sincerely,

Shaja B. Joyner, Product Manager 20 Fungicide and Herbicide Branch Registration Division (7504P)

Enclosure

4110 136th St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

October 24, 2014

OVERNIGHT DELIVERY

Tony Kish (PM 22)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Dear Mr. Kish,

RE: ChemStarr, LLC

Tide Triadimefon Technical (EPA Reg. No. 81964-4)
Submission of a Non-PRIA Fast Track Label Amendment to Remove <u>Voluntary</u> Residential Use Site Restrictive Language

On behalf of ChemStarr, LLC, please find the enclosed label amendment to remove previously added voluntary residential use site restrictive language. ChemStarr LLC voluntarily added residential site restrictive language to the technical label based on an agreement with the Outdoor Residential Exposure Task Force (ORETF). The following sentence was added "Do not formulate into end use products labeled for outdoor residential use on lawns, turf, home gardens, ornamentals, flowers, shrubs and trees." ChemStarr has since amended their agreement with ORETF and requests that the residential site restrictive language be removed. Other minor label changes are also made at this time.

In support of this label amendment we submit the following documents:

- 1. Completed Application for Amendment (EPA Form 8570-1)
- 2. One (1) copy of the Tide Triadimefon Technical label with changes tracked
- 3. Five (5) copies of the Tide Triadimefon Technical label with changes incorporated
- 4. A CD containing an electronic version of the label
- 5. Certification with Respect to Label Integrity
- 6. Letter of Authorization

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, ChemStarr believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please contact me ((253) 853-7369, Ann@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

Ann M. Tillman

Enclosures

cc: Dennis Pfeiffer, ChemStarr, LLC

Please read instructions of	on reverse before compl		- 1- y-w	Form Approved	AB No.	2070-006	O. Approvel expires 2-28-9
\$EPA	Environmenta	United States I Protection Ington, DC 20		7	Registra Amend Other		OPP Identifier Number
		Application	on for Pesticide	- Section	ī		
1. Company/Product Num 81964-4	aber		2. EPA Pro T. Kish	duct Manager		3. Pi	roposed Classification
4. Company/Product (Nar ChemStart, LLC/Tide Tria			PM#	22	20		Note Heatiscied
S. Name and Address of a ChemStarr, LLC c/o Pyxis Regulatory 4110 136th St. NW Gig Harbor, WA 9833	Consulting, Inc.	ode)	(b)(i), my to: EPA Reg Product	product is sim	nilar or iden	tical in co	FIFRA Section 3(c)(3) emposition and labeling
			Section - II				
✓ Amendment - Expl Resubmission in re Notification - Expla	esponse to Agency lette	r dated	A	nal printed labe gency letter dat Ne Too" Applica ther - Explain be	ed ation.	e to	
1. Material This Product V	Will Be Deckared in:		Section - III	.,			
Child-Resistant Packaging			Water Soluble Pack	eging	2. Type of	Container	
Yes ✓ No	Yes Vo		Yes ✓ No			Metal Plastic Glass	
 Certification must be submitted 	If "Yes" Unit Packaging wgt	No. per . container	If "Yes" Peckage wgt	No. per container	1	Other (S	Specify) lined supersacks
3. Location of Net Conten	ts Information	4. Size(s) Ret	tail Container (25 kg), 826.7 lb (375	111	cation of Lal	el Directio	
6. Manner in Which Label		✓ Lithog Paper Stence	raph [Other			
			Section - IV				
1. Contact Point (Comple	te items directly below	for identification		ntected, if nec	essary, to pi	ocess this	application.)
Name Ann Tillman			Title Agent			4500 IV. • 40 COUR	e No. (Include Area Code) 53-7369
	itements I have made or any knowlinglly false or Ie law.		all attachments theret				6. Date Application Received (Stamped)
2. Signature	In Tillin	a	3. Title Agent				
4. Typed Name Ann Tillman		STATE OF THE PARTY	5. Date 10/24,	114			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

October 29, 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

DER-I WANG CHEMSTARR LLC 21 HUBBLE IRVINE, CA 92618-

PRODUCT NAME: TIDE TRIADIMEFON TECHNICAL

COMPANY NAME: CHEMSTARR LLC

OPP IDENTIFICATION NUMBER:

EPA FILE SYMBOL: 81964-4 EPA RECEIPT DATE: 10/24/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 22, at (703) 308-9443.

Sincerely.

Front End Processing Staff Information Services Branch

Information Technology & Resources Management Division



CHEMSTARR LLC

21 Hubble Irvine, Ca. 92618, USA

Phone: 949-679-3535 Fax: 949-679-3538

July 8, 2014

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for ChemStarr, LLC (EPA Company Number 81964), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Dennis L. Pfeiffer

Sincerely

General Manager ChemStarr, LLC.

cc: Pyxis Regulatory Consulting, Inc.

ACCEPTED

02/06/2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg No. 81964-4

Tide Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:	
Triadimefon:	99.0%
OTHER INGREDIENTS:	<u>1.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
If swallowed:	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything to an unconscious person.
If inhaled:	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If in eyes:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
	NOTE TO PHYSICIAN dote. Treat symptomatically. This compound does not cause any definite symptoms that isoning is accompanied by hyperactivity followed by sedation.
	HOT LINE NUMBER
	ner or label with you when calling a poison control center or doctor, or going for treatment. HEMTREC at 1-800-424-9300 for emergency medical treatment information.

See inside label booklet for Precautionary Statement and Storage and Disposal.

Manufactured in China

EPA Reg. No. 81964-4 EPA Est. No. Manufactured for:

ChemStarr, LLC 21 Hubble Irvine, CA 92618

Net Weight:

55 lbs. (25 kg)/bag

□ 826 lbs (375 kg)/bag

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed, absorbed through skin, inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is only for formulation into a fungicide for the following use(s):

- (1) golf course turfgrass, sod farm turfgrass, outdoor- and greenhouse-grown ornamentals (trees, shrubs, flowering plants, including roses), azaleas (for control of pine-twisting rust only), pine trees (including Christmas trees), pine seedlings, pine seed, and pineapple (pre-plant dip and postharvest dip only);
- (2) uses for which US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and
- (3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferably in a locked storage area. If product spills or container leaks, carefully sweep and collect material into a pile. Follow directions below for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the outer bag for recycling, if available.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such use or the results to be obtained if not used in accordance with printed directions and established safe practice. To the extent consistent with applicable law, buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages or injuries resulting from the use or handling of this product, whether or not based in contract, negligence, strict liability in tort or otherwise shall be limited, at the manufacturer's option to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed.

[20140919]

Material Sent for Data Extraction

Reg. # 81964-4
Description: New MVP Registration
Material(s) Sent to Data Extraction Contractors:
New Stamped Label Dated 9/19/19
Notification Dated
New CSF(s) Dated 07/3114
☐ Other:
Decision #: 493122
Other Action/Comments:
File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716. Reviewer: Maryam K. Muhammad
Phone: <u>703-347-0301</u> Division: <u>RD</u>
Date:1 19 14



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W.

Washington, D.C. 20460

EPA Reg. Number:

Date of Issuance:

81964-4

SEP 1 9 2014

NOTICE OF PESTICIDE:

X Registration
Reregistration
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

Tide Triadimefon Technical

Name and Address of Registrant (include ZIP Code):

ChemStarr, LLC 21 Hubble Irvine, CA 92618 Mailed to:

Anne M. Tillman Agent for ChemStarr, LLC Pyxis Regulatory Consulting, Inc. 4110 136th St. NW

Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration/registration/registration review of your product when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Tony Kish, Product Manager 22

Fungicide Branch, Registration Division (\$\forall 505P)

Date:

SEP 1 9 2014

Page 2 of 2 EPA Reg. No. 81964-4 Decision No. 493122

EPA Form 8570-6

- 1. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 81964-4."
- Submit one copy of the revised final printed label for the record before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

Basic CSF dated 07/03/2014

If you have any questions, please contact Maryam Muhammad at (703) 347-0301 or Muhammad.maryam@epa.gov.

Tony Kish, Product Manager 22

Fungicide Branch

Registration Division (7505P)

Enclosure:

Label stamped "Accepted"

Tide Triadimefon Technical

FOR MANUFACTURING USE ONLY

ACTIVE INGREDIENT:

Triadimefon:	99.0%
OTHER INGREDIENTS:	<u>1.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID					
If swallowed:	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor Do not give anything to an unconscious person. 				
If inhaled:	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice. 				
If on skin or clothing:	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. 				
If in eyes:	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. 				

NOTE TO PHYSICIAN

There is no specific antidote. Treat symptomatically. This compound does not cause any definite symptoms that would be diagnostic. Poisoning is accompanied by hyperactivity followed by sedation.

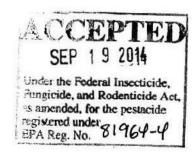
HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Capital Poison Center at 1-800-222-1222 for emergency medical treatment information.

EPA Reg. No. 81964-4 EPA Est. No. Manufactured for: ChemStarr, LLC

> 21 Hubble Irvine, CA 92618

Net Weight: lbs.



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed, absorbed through skin, inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not formulate into end-use products labeled for outdoor residential use on lawns, turf, home gardens, ornamentals, flowers, shrubs, and trees. Subject to that restriction, this product is only for formulation into a fungicide for the following use(s):

- (1) golf course turfgrass, sod farm turfgrass, outdoor- and greenhouse-grown ornamentals (trees, shrubs, flowering plants, including roses), azaleas (for control of pine-twisting rust only), pine trees (including Christmas trees), pine seedlings, pine seed, and pineapple (pre-plant dip and postharvest dip only);
- (2) uses for which US EPA has accepted the required data or citations of data that the formulator has submitted in support of registration, and
- (3) uses for experimental purposes that are in compliance with US EPA requirements.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place away from food, drink and animal feeding stuffs. Store in original container and out of reach of children, preferable in a locked storage area. If product spills or container leaks, carefully sweep and collect material into a pile. Follow directions below for disposal.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on-site or at an approved waste disposal facility. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Then dispose of liner in a sanitary landfill or by incineration if allowed by state and local authorities. Offer the drum for recycling, if available.

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CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

Our recommendations for use of this product are based upon tests believed to be reliable. The use of this product being beyond control of the manufacturer, no guarantee, expressed or implied, is made as to the effects of such use or the results to be obtained if not used in accordance with printed directions and established safe practice. To the extent consistent with applicable law buyer's exclusive remedy and manufacturer's or seller's exclusive liability for any and all claims, losses, damages or injuries resulting from the use or handling of this product, whether or not based in contract, negligence, strict liability in tort or otherwise shall be limited, at the manufacturer's option to replacement of, or the repayment of the purchase price for, the quantity of product with respect to which damages are claimed.

[EPA Approval Date]

Muhammad, Maryam K.

From:

postmaster@prc.pyxisrc.com

To:

ann@pyxisRC.com

Sent:

Friday, September 19, 2014 2:39 PM

Subject:

Delivered: 81964-4 New Product Registration Status

Your message has been delivered to the following recipients:

ann@pyxisRC.com

Subject: 81964-4 New Product Registration Status



81964-4 New Product Registra...

Muhammad, Maryam K.

From:

Muhammad, Maryam K.

Sent:

Wednesday, September 17, 2014 8:50 AM

To:

'Ann Tillman'

Subject:

RE: EPA REG. NO. 81964-U Registration Update

Thank you.

From: Ann Tillman [mailto:Ann@PyxisRC.com]
Sent: Tuesday, September 16, 2014 5:47 PM

To: Muhammad, Maryam K.

Subject: RE: EPA REG. NO. 81964-U Registration Update

Maryam,

The revised label is attached. I will take care of the label notification for

this week. Thanks!

Ann

From: Muhammad, Maryam K. [mailto:Muhammad.Maryam@epa.gov]

Sent: September 16, 2014 2:23 PM

To: Ann Tillman

Subject: EPA REG. NO. 81964-U Registration Update

Dear Ms. Tilman:

The agency is in the process of reviewing your application for EPA Reg. No. **81964-U**. In order to complete this application please make the following changes to the label and resubmit an electronic version with these edits. Please see attached labels for highlighted changes.

*Please note the changes regarding the hot line number needs to be changed on the cited product notification as well.



If you have any questions or concerns please feel free to contact me at 703-347-0301 or by email Muhammad.maryam@epa.gov.

Thank you for your time.

Product ingredient source information may be entitled to confidential treatment

Best Regards,

Maryam K. Muhammad Biologist Registration Division EPA Office of Pesticide Programs (703) 347-0301 *Product ingredient source information may be entitled to confidential treatment*

Muhammad, Maryam K.

From:

Ann Tillman <Ann@PyxisRC.com>

Sent:

Wednesday, August 06, 2014 7:15 AM

To:

Muhammad, Maryam K.

Subject:

RE: EPA REG. NO 81964-U PRIA APPLICATION CHANGES

Attachments:

05292014 EPA Letter-

Completed.pdf

Maryam,

Attached is the Agency's response to the request to change the plant's address.

Ann

From: Muhammad, Maryam K. [mailto:Muhammad.Maryam@epa.gov]

Sent: August 05, 2014 4:56 PM

To: Ann Tillman

Subject: RE: EPA REG. NO 81964-U PRIA APPLICATION CHANGES

Hi Ann

Thank you for your response.

These revised documents will be added to your file.

Have a great day.

From: Ann Tillman [mailto:Ann@PyxisRC.com]
Sent: Tuesday, August 05, 2014 3:05 PM

To: Muhammad, Maryam K.

Subject: RE: EPA REG. NO 81964-U PRIA APPLICATION CHANGES

Maryam,

Attached, please find the revised data matrices (Agency and Public Use versions) and the revised label. Regarding point 3 below, a copy of the correspondence from the agent of the plant to Michelle Stevenson dated Jan. 10, 2014 is attached. This correspondence requested that the address on record be changed. I have asked the agent if they received any response from Ms. Stevenson but I know Ms. Stevenson is fairly behind in these administrative type actions. I'll forward any response to you when I receive it.

Ann

Ann M. Tillman, Ph.D.
Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332
Office (253) 853-7369
Fax (253) 853-5516
Email Ann@PyxisRC.com

From: Muhammad, Maryam K. [mailto:Muhammad.Maryam@epa.gov]

Sent: August 05, 2014 11:50 AM

To: Ann Tillman

Subject: EPA REG. NO 81964-U PRIA APPLICATION CHANGES

Hi Ms. Tillman,

Thank you for your submission of Pesticide Registration Application EPA Reg. No. **81964-U**. Your submission is currently under review.

Upon reviewing your application we found the following errors:

- 1.) The word Volume 1 needs to be removed from your data matrix document. Please resubmit this document via email with an updated date.
- 2.) Storage and Disposal language needs to be updated. Please see attached label with highlighted changes for details.
- 3.) The address under section 2 of your CSF does not match the address on the cited CSF EPA Reg. No. you please explain why this is the case. If this is an error please resubmit your CSF to me with the updated producer address.

In order to expedite this review this information can be submitted electronically if you feel comfortable sending your companies documents by email.

Please feel free to contact me if you have any guestions or concerns.

Regards,

Maryam K. Muhammad Biologist Registration Division EPA Office of Pesticide Programs (703) 347-0301 *Product ingredient source information may be entitled to confidential treatment*



Please read instructions o	n reverse before comple	ting form,	Form Ap	proved, OMB No.	2070-006	O. Approve expires 2-28-95
\$EPA	Environmenta	Inited States 1 Protection Agrington, DC 20460	ancy	✓ Registre Amend Other		OPP Identifier Number
		Application for	Pesticide - Sec	tion I		
1. Company/Product Num 81964- 以	ber		2. EPA Product Mar T. Kish	neger	3, Pr	oposed Classification
 Company/Product (Nan ChemStarr, LLC/Tide Trial 			PM#	22		Australia Australia (Australia Australia Australia Australia Australia Australia Australia (Australia Australia Australia Australia Australia Australia Australia Australia Australia (Australia Australia Aus
5. Name and Address of A ChemStarr, LLC c/o Pyxis Regulatory (4110 136th St. NW Gig Harbor, WA 9833	Consulting, Inc.		(b)(i), my product to: EPA Reg. No. 2 Product Name	is similar or iden	tical in co	FIFRA Section 3(c)(3) imposition and labeling licide
		Sec	ction - II			
Resubmission in re	sponse to Agency letter	r dated	Agency let	d labels in repsons ter deted Application. olain below,	e to	
fee which has been p		Sec	etion - III			
1. Material This Product \	Vill Be Packaged In:	HERON BANKS AND				
Child-Resistant Packaging Yes No Certification must be submitted	Unit Packaging Yes No If "Yes" Unit Packaging wgt	No. per If 'Ye	Yes No No. per nge wgt containe	2. Type of	Metal Plestic Glass Paper Other (S	lined supersolve
3. Location of Net Conten	ts Information	4. Size(s) Retail Conta 55.1 lb (25 kg),	lainer 826.7 lb (375 kg)	5. Location of La On Label On Labelin	bel Direction	
6. Manner in Which Label	is Affixed to Product	Lithograph Paper glued Stenciled	Othe	r		
-			tion - IV			
1. Contact Point (Comple	te items directly below			if necessary, to p	rocess this	application.!
Name Ann Tillman		Title Agent			Talaphon	e No. (Include Area Code) 53-7369
I certify that the sta I acknowledge that both under applicab	stements I have made or any knowlingly false or ile law.	Certification this form and all attac misleading statement r	hments thereto are tru nay ba punishable by f	e, accurate and co ine or imprisonmen	mplete. nt or	6. Date Application Received (Stamped)
	n Mille	3. Title Agent				
4. Typed Name Ann illiman		5. Date	1/10/14			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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Information Management Division (2137), U.S. Environmental Protection Agency, 40 Do not send the completed form to this address.	1 M Street, S.W., V	Washington, DC 20460.
Certification with Respec	t to Citation o	f Data
Applicant's/Registrant's Name, Address, and Telephone Number ChemStarr, LLC. do Pyxis Regulatory Consulting 4110 136th St. NW Gig Harbor, WA 98332 (253) 853-7369		EPA Registration Number/File Symbol 81964 — U
Active Ingredient(s) and/or representative test compound(s) Triadimefon		Date 7/21/14
General Use Pattem(s) (list_all those claimed for this product using 40 CFR Part 158 TGAI	9)	Product Name Tide Triadimefon Technical
NOTE: If your product is a 100% repackaging of another purchased EPA-registers submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator's Exemption Statement)		for all the same uses on your label, you do not need to
i am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies	sent offers of compensation (the Data Matrix form should
SECTION I: METHOD OF DATA SUPP	ORT (Check one	method anly)
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	under th	ing the selective method of support (or cite-all option he selective method), and have included with this form a led list of data requirements (the Data Matrix form must be
SECTION II: GENERAL	OFFER TO PAY	
I hereby offer and agree to pay compensation, to other persons, with regard to		is application, to the extent required by FIFRA.
SECTION III: CERT	IFICATION	
I certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files tha substantially similar product, or one or more of the ingredients in this product; and (2) requirements in effect on the date of approval of this application if the application souguses. I certify that for each exclusive use study cited in support of this registration.	addition, if the cite 1 (1) concern the p is a type of data th ght the initial regist	e-all option or cite-all option under the selective method is roperties or effects of this product or an identical or at would be required to be submitted under the data ration of a product of identical or similar composition and
the written permission of the original data submitter to cite that study. I certify that for each study cited in support of this registration or reregistration submitter; (b) I have obtained the permission of the original data submitter to use the compensation have expired for the study; (d) the study is in the public literature; or (e) offered (l) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c) amount and terms of compensation, if any, to be paid for the use of the study.	study in support of I have notified in v	this application; (c) all periods of eligibility for writing the company that submitted the study and have
I certify that in all instances where an offer of compensation is required, cop accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be evidence to the Agency upon request, I understand that the Agency may initiate action FIFRA.	be submitted to the	Agency upon request. Should I fail to produce such
I certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso	ents to it are true nment or both ur	e, accurate, and complete. I acknowledge that any inder applicable law.
Signature Que Kur Eller	Date 7/21/14	Typed or Printed Name and Title Ann M. Tillman, Agent

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

July 11, 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

PYXIS REGULATORY CONSULTING, INC CHEMSTARR LLC 4110 136TH ST NW GIG HARBOR, WA 98332

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 11-JUL-14. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

July 14, 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

OPP Decision Number: D-493122

EPA File Symbol or Registration Number: 81964-U Product Name: TIDE TRIADIMEFON TECHNICAL

EPA Receipt Date: 11-Jul-2014 EPA Company Number: 81964

Company Name: CHEMSTARR LLC

ANN TILLMAN

AGENT FOR: CHEMSTARR LLC

PYXIS REGULATORY CONSULTING INC.

4110 136TH STREET, NW GIG HARBOR, WA 98332

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R333

NEW PRODUCT; MUP OR END USE PRODUCT WITH UNREGISTERED SOURCE OF THE ACTIVE INGREDIENT; REQUIRES SCIENCE DATA REVIEW; NEW PHYSICAL FORM; CITE-ALL OR SELECTIVE DATA CITATION WHERE APPLICANT OWNS ALL REQUIRED DATA;

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Peresa D.

Front End Processing Staff

Information Technology & Resources Management Division

Arianna Shorey

From:

paygovadmin@mail.doc.twai.gov

Sent:

Tuesday, July 08, 2014 10:17 AM

To:

Arianna Shorey

Subject:

Pay.gov Payment Confirmation: PRIA Service Fees

Follow Up Flag:

Follow up

Flag Status:

Flagged

Your payment has been submitted to Pay.gov and the details are below. If you have any questions or you wish to cancel this payment, please contact Pay.gov Customer Service by phone at (800) 624-1373 or by email at pay.gov.clev@clev.frb.org.

Application Name: PRIA Service Fees Pay.gov Tracking ID: 25GIKFLC Agency Tracking ID: 74644602542

Transaction Type: Sale

Transaction Date: Jul 8, 2014 1:17:09 PM

Account Holder Name: Luz E. Gudino Transaction Amount: \$18,893.00 Billing Address: 624 San Nicholas Ct.

City: Laguna Beach State/Province: CA Zip/Postal Code: 92651

Country: USA Card Type: Visa

Card Number: *********4679

Decision Number: Registration Number:

Company Name: ChemStarr LLC Company Number: 81964

Action Code: R333

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.





Tide International USA Inc.

21 Hubble, Irvine, CA 92618 Phone: 949-679-3535 Fax: 949-679-3538

June 30, 2014

Registration Division
Office of Pesticide Programs (7505 P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Attn: Tony Kish, PM 22

Subject: Letter of Authorization

Permission to Cite Data

Dear Mr. Kish:

Tide International USA Inc., is informing the Agency that ChemStart LLC is authorized to cite the following data which is owned by Tide International USA, Inc., in applying for registration of their technical product Triadimefon Technical:

Mi	RID
47327501	47327507
47327502	47327508
47327503	47327509
47327504	47327510
47327505	47327511
47327506	47801601

This authorization is qualified to the extent that 1) neither the applicant nor any other person, except the Agency, shall have access to said data unless specifically authorized in writing by Tide International USA Inc.; 2) This authorization shall not be transferred by the applicant in any manner whatsoever without the express prior consent of Tide International USA, Inc.

If you have any questions, please do not hesitate to contact me.

Sincerely.

Vice President/General Manager Tide International USA, Inc.



地址。浙江省绍文格江王亚区马馬王亚闰1号路 解稿。312071 TEL。+86.515-88979009

E mail: infortide chira com

ADD: Road I, Mahar Industrial Garden Paojiang Industrial Zone, Shaoxing, Zhejiang Powince (312071), China FAX: -86-375-88959010

Website: www.tide.china.com

AUTHORIZATION LETTER

To whom it may concern,

We, Zhejiang Tide CropScience Co., Ltd. located at Road 1, Mahai Industrial Garden, Paojiang Industrial Zone, Shaoxing, Zhejiang Province (312071), China, which branch head office in USA located 21 Hubble, Irvine, CA 92618, hereby authorize CHEMSTARR, LLC to use the following studies to apply for EPA registration of Triadimefon technical:

Study title	Study number
Product chemistry of Triadimefon technical	10536-06
Preliminary analysis report of Triadimefon Technical	10534-06
Validated analytical method to analyze an impurity of toxicological concern in a technical grade material of Triadimefon tech.	11352-07
Acute oral toxicity study of Triadimefon technical in rats	10528-06
Acute dermal toxicity study of Triadimefon technical in rabbits	10529-06
Acute inhalation toxicity study of Triadimefon technical in rats	10530-06
Acute dermal irritation study of Triadimefon technical in rabbits	10532-06
Acute eye irritation study of Triadimefon technical in rabbits	10531-06
Skin sensitization study of Triadimefon technical in guinea pigs	10533-06
Rainbow trout (Oncorhynchus mykiss) 96-hour acute toxicity test of Triadimefon technical	10538-06
Daphnia magna 48-hour acuty toxicity test of Triadimefon technical	10537-06

ZHEJIANG TIDE CROPSCIENCE CO, LTD.

Name: Yang Zhengyu

Responsibility: Gener

Signature:

Date: May 22, 2014



CHEMSTARR LLC

21 Hubble Irvine, Ca. 92618, USA

Phone: 949-679-3535 Fax: 949-679-3538

July 8, 2014

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for ChemStarr, LLC (EPA Company Number 81964), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely

Dennis L. Pfeiffer General Manager ChemStarr, LLC.

cc: Pyxis Regulatory Consulting, Inc.

Pages 33-34 * Claimed confidential by submitter*

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Date Aug. 5, 2014			EPA Reg. No /File Symbol 81964-U		Page of 5
Applicant's/Registrant's Name & Address ChemStarr, LLC 21 Hubble Irvine, CA 92618		Product Tide Triadimefon Technical			
Ingredient Triadimefon (CAS No. 4	3121-43-3)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Re	quirements				
830.1550	Product Identity and Composition	47327501	Tide International USA, Inc.	PER	
830.1600	Description of Materials Used to Produce the Product	47327501	Tide International USA, Inc.	PER	
830.1620	Description of Production Process	47327501	Tide International USA, Inc.	PER	
830.1650	Description of Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	47327501	Tide International USA, Inc.	PER	
830.1700	Preliminary Analysis	47327502 47327503	Tide International USA, Inc. Tide International USA, Inc.	PER PER	
830.1750	Certified Limits	47327501	Tide International USA, Inc.	PER	
830.1800	Enforcement Analytical Method	47327501	Tide International USA, Inc.	PER	
830.6302	Color	47327504	Tide International USA, Inc.	PER	
830.6303	Physical State	47327504	Tide International USA, Inc.	PER	
830.6304	Odor	47327504	Tide International USA, Inc.	PER	
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	47327505	Tide International USA, Inc.	PER	Waiver ²
330.6314	Oxidation/Reduction: Chemical Incompatibility	47327505	Tide International USA, Inc.	PER	
330.6315	Flammability	47327505	Tide International USA, Inc.	PER	Waiver ³
an Mille			Name and Title Ann M. Tillman, Consultant		Date Aug. 5, 2014

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	DATA	MATRIX			
Date Aug. 5, 2014			EPA Reg. No./File Symbol 81964-U		Page 2 of 5
Applicant's/Registrant's Name & Address ChemStarr, LLC 21 Hubble Irvine, CA 92618			Product Tide Triadimefon Technical		
Ingredient Triadimefon (CAS No. 4	3121-43-3)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explodability	47327505	Tide International USA, Inc.	PER	Waiver ⁴
830.6317	Storage Stability	47801601	Tide International USA, Inc.	PER	
830.6319	Miscibility				Not required ⁵
830.6320	Corrosion Characteristics	47801601	Tide International USA, Inc.	PER	
830.6321	Dielectric Breakdown Voltage				Not required ⁶
830.7000	pH	47327504	Tide International USA, Inc.	PER	
830.7050	UV/Visible Absorption	47327504	Tide International USA, Inc.	PER	
830.7100	Viscosity			ALC: N	Not required ⁷
830.7200	Melting Point/Melting Range	47327504	Tide International USA, Inc.	PER	
830.7220	Boiling Point/Boiling Range		Carrier Carrie		Not required ⁸
830.7300	Density/Relative Density/Bulk Density	47327504	Tide International USA, Inc.	PER	
830.7370	Dissociation Constants in Water	47327505	Tide International USA, Inc.	PER	Waiver ⁹
830.7520	Particle Size, fiber length, and diameter distribution	47327505	Tide International USA, Inc.	PER	Waiver ¹⁰
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	47327505	Tide International USA, Inc.	PER	
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				See 830.7560
Signature			Name and Title		Date
am M. Tiller			Ann M. Tillman, Consultant		Aug. 5, 2014

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WASHINGTON, D.C. 20460

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	DATA	MATRIX		-	
Date Aug. 5, 2014			EPA Reg. No./File Symbol 81964-U		Page3 of 5
Applicant's/Registrant's Name & Address ChemStarr, LLC 21 Hubble Irvine, CA 92618		Product Tide Triadimefon Technical			
Ingredient Triadimefon (CAS No. 43121	-43-3)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7560
830.7840	Water Solubility: Column Elution Method; Shake Flask Method	47327505 47327504	Tide International USA, Inc. Tide International USA, Inc.	PL PL	
830.7860	Water Solubility, Generator Column Method				See 830.7840
830.7950	Vapor Pressure	47327505	Tide International USA, Inc.	PL	
870.1100	Acute Oral Toxicity: Rat	47327506	Tide International USA, Inc.	PER	
870.1200	Acute Dermal Toxicity: Rat	47327507	Tide International USA, Inc.	PER	
870.1300	Acute Inhalation Toxicity: Rat	47327508	Tide International USA, Inc.	PER	
870.2400	Primary Eye Irritation: Rabbit	47327509	Tide International USA, Inc.	PER	
870.2500	Primary Dermal Irritation	47327510	Tide International USA, Inc.	PER	
870.2600	Dermal Sensitization	47327511	Tide International USA, Inc.	PER	
Generic Data Requirements					
	ite-all method of data citation and has made offers adimefon data submitters list of March 27, 2014.	s-to-pay to the			
		Cite-All	Syngenta Crop Protection, LLC	PAY	
		Cite-All	Bayer Cropscience LP	PAY	
Signature M. Tiller			Name and Title Ann M. Tillman, Consultant		Date Aug. 5, 2014

Form Approved OMB No. 2070-0060

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WASHINGTON, D.C. 20460

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		DATA MATRIX	100		
Date Aug. 5, 2014			EPA Reg. No./File Symbol 81964-U		Page of 5
Applicant's/Registrant's Name & Address ChemStarr, LLC 21 Hubble Irvine, CA 92618		Product Tide Triadimefon Technical			
Ingredient Triadimefon (CAS No. 4	3121-43-3)		r		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	E.I. DuPont de Nemours and Co.	PAY	
		Cite-All	Bayer Environmental Science	PAY	
		Cite-All	Bayer Corp.	PAY	
		Cite-All	Knox Fertilizer Co., Inc.	PAY	
		Cite-All	The Andersons Lawn Fertilizer Division	PAY	
		Cite-All	Agan Chem Mfg., Ltd.	PAY	
		Cite-All	Lanxess Corp.	PAY	
		Cite-All	Woodstream Corp.	PAY	
		Cite-All	Tessenderlo Kerley, Inc.	PAY	
		Cite-All	Florida Silvics Inc.	PAY	
		Cite-All	Spray Drift Task Force	PER	See endnote ¹
		Cite-All	Outdoor Residential Exposure Task Force	PER	See endnote ¹
4		Cite-All	Agricultural Reentry Task Force	PER	See endnote ¹
5		Cite-All	Bayer Advanced	PAY	
Signature Ann M. Jellen			Name and Title Ann M. Tillman, Consultant	*	Date Aug. 5, 2014

Form Approved OMB No. 2070-0060

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*	4 4	DATA MATRIX	58.		8
Date Aug. 5, 2014			EPA Reg. No./File Symbol 81964-U		PageSof 5
Applicant's/Registrant's Name & Address ChemStarr, LLC 21 Hubble Irvine, CA 92618		Product Tide Triadimefon Technical			
Ingredient Triadimefon (CAS No. 4	3121-43-3)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	FIFRA Endangered Species Task Force	PAY	
		Cite-All	Residential Exposure Joint Venture	PAY	
		Cite-All	Agricultural Handler Exposure Task Force	PER	See endnote ¹¹
		Cite-All	U.S. Triazole Task Force	PAY	
		Cite-All	Tide International USA, Inc.	PER	See endnote ¹²
Signature A. Juller			Name and Title Ann M. Tillman, Consultant		Date Aug. 5, 2014

Endnotes for Data Matrix for Tide Triadimeton Technical

- 830.6315 ChemStarr, LLC requests a waiver from the requirement for flammability for Tide Triadimefon Technical based on the fact that this technical is a solid and is not expected to be flammable. Please refer to the Confidential Statement of Formula for Tide Triadimefon Technical.
- 4 830.6316 ChemStarr, LLC requests a waiver from the requirement of this study. Tide Triadimefon Technical does not have the chemical bonds or functional groups associated with explosive chemicals. Please refer to the Confidential Statement of Formula for additional information on the composition of Tide Triadimefon Technical.
- 830.6319 These data are required when the product is an emulsifiable liquid and to be diluted with petroleum solvents. Tide Triadimefon Technical is a solid and not an emulsifiable liquid. Therefore, this data requirement is not applicable to Tide Triadimefon Technical.
- 6 830.6321 These data are required if the end use product is to be used around electrical equipment. Tide Triadimefon Technical is not an end use product and therefore this data requirement is not applicable.
- ⁷ 830.7100 These data are required when the product is a liquid. Tide Triadimefon Technical is a solid. Therefore, this data requirement is not applicable to Tide Triadimefon Technical.
- 8 830.7220 Boiling point data are only required for liquids. Tide Triadimefon Technical is a solid. Therefore, this data requirement is not applicable to Tide Triadimefon Technical.
- 830.7370 ChemStarr, LLC is seeking a waiver for the dissociation constant for Tide Triadimefon Technical because the chemical does not contain any functionality that would dissociate. The EPA Reregistration Eligibility Decision document for triadimefon listed this data requirement as not being applicable (Ref.: Reregistration Eligibility Decision for Triadimefon and Tolerance Reassessment for Triadimenol, August 2006, Appendix B-1, page 85).
- 830.7520 ChemStarr, LLC is seeking a waiver for this data requirement for Tide Triadimefon Technical because the product is not water insoluble nor is it a fibrous material.
- ¹¹ ChemStarr, LLC is a member in good standing with this task force.
- 12 ChemStarr, LLC and Tide International USA, Inc. are affiliated companies.

¹ 830.1650 - These data are not required for the registration of a technical product. See 830.1620 for production process information.

² 830.6313 - ChemStarr, LLC will not be packaging Tide Triadimefon Technical in metal containers, nor is it expected to come into contact with metals or metal ions during its storage. In addition, Tide Triadimefon Technical is not expected to be subjected to temperatures greater than 50°C during its production or storage. Therefore, ChemStarr, LLC seeks a waiver from the requirement for these data.



